

# **EXHIBIT D**

**August 17, 2015 Statement for the Media**

8/17/2015

St. Paul's School has policies in place to ensure that our students are safe, secure, and treated equitably. Our faculty and staff do their utmost to enforce these policies and to guide our students concerning challenging topics. At St. Paul's, breaches of School policies, or the trust upon which they are founded, are addressed swiftly and judiciously. All School discipline strives to address the failings of the individual and serve as a platform for deeper learning for the community. We do not tolerate conduct that is at odds with our commitment to a safe and welcoming environment for everyone in the St. Paul's School community. Current allegations about our culture are not emblematic of our School or our values, our rules, or the people who represent our student body, alumni, faculty, and staff.

Michael G. Hirschfeld '85

Rector, St. Paul's School

**Update: Owen Labrie Trial 8/28/2015**

8/28/2015

Special statement from the Rector

"We must first commend the remarkable moral courage and strength demonstrated by the young woman who has suffered through this nightmare. Her resolve and unwavering commitment to the truth have been inspiring to us and to many outside our School community. We can only hope that time will bring some measure of healing and comfort to both her and her family.

The entire St. Paul's School community has been deeply affected by this incident. It is our responsibility to ensure that our students live and learn together in a community that is built on respect, caring, and support for one another. Anything short of that cannot and will not be accepted. We will continue to focus on teaching our students our core values – that they live honorably, respectfully, and never forget to be kind – and that they learn and grow in ways that lead to productive and respectful relationships throughout their entire lives."

Michael G. Hirschfeld '85

Rector, St. Paul's School

## **FAQ: Owen Labrie Trial**

9/4/2015

Questions and answers concerning the Labrie trial

### **1. What is your reaction to the decision?**

This trial has been deeply painful for all of us in the St. Paul's community, but especially for the young woman who has suffered through this nightmare. From the beginning – some 15 months ago – to the conclusion of the trial, she and her family have shown remarkable moral courage and strength. Her resolve and unwavering commitment to the pursuit of the truth have been inspiring to us and to many outside our School community. We can only hope that time will bring some measure of healing and comfort to both her and her family.

### **2. How would you address the former students and their families?**

No parent ever wants to see their child suffering. This situation and the details presented in court were deeply troubling to both families, as well as to the entire St. Paul's School Community. Our hope is that time will bring some measure of healing to all involved.

### **3. What do you have to say about the allegations about the School's culture?**

The allegations about St. Paul's and our culture were not – and are not – emblematic of our School or our values, our rules, or our student body, alumni, faculty, and staff. Those claims just simply aren't true.

### **4. Was St. Paul's aware of the "senior salute?"**

The Rector first heard about "senior salute" in the spring of 2013. It is not a decades-old "tradition" as some have alleged. As you have learned throughout the trial, the phrase "senior salute" described a wide range of behaviors related to spending time with other students – none of these behaviors was ever understood to include any type of "game" of sexual conquest. We revised the Student Handbook to state more explicitly that participation in that type of activity would be grounds for expulsion, as would any unauthorized possession of School keys or swipe cards.

### **5. Did the School allow this to happen?**

The School has never allowed, condoned or supported inappropriate behavior. We have well communicated rules, disciplinary responses, trainings, counseling programs, and procedures to ensure that all members of our community understand the expectations

for behavior and conduct, and the consequences for their actions when School expectations are breached. Conduct that is damaging to the fabric of our community and inconsistent with our values has never been – and will not be – tolerated.

#### **6. What is the School doing to prevent sexual assault?**

In June of 2014, we pledged that we would use the issues raised by this case to learn more about ourselves and to make our School better. We began more than a year ago by:

- conducting a comprehensive review of the safety of our School environment and of our reporting procedures to ensure they continue to meet the highest standards,
- implementing policy changes, and enhancing programming in several key areas to further support our students in making St. Paul's the healthiest residential learning environment possible,
- inviting independent experts and researchers to our campus to advise us on the best ways to strengthen the trust, respect, and understanding that is so critical for a tight-knit, fully residential community like ours (See the "[From the Rector](#)" page of our website under the "[Focus on Healthy Community](#)" section for details.) and,
- developing and implementing, based on advice and guidance from a team public health professionals, additional programming to strengthen our community through enhanced education and prevention efforts in such areas as harassment, bullying, gender-based violence, and substance abuse.

In the coming year, we will build on the work we've begun with initiatives that include:

- strengthening our Living in Community curriculum, which underscores the School's core values to be kind and live honorably,
- expanding the visiting expert speakers program to heighten awareness, build skills, and broaden perspectives among all members of the School community,
- developing new bystander intervention training for all students and heads of house, and
- conducting a review of School policies and practices surrounding student conduct and discipline.

Our expectation is that these efforts will allow our faculty, staff, administration, and students to continue to be engaged in critical introspection with an eye to improving how we live together.

**7. How has the reputation of St. Paul's been affected?**

St. Paul's is one of the best educational institutions in the country. Our mission remains the same as it was when we were founded 159 years ago – to teach our students our core values – that they live honorably, respectfully, and never forget to be kind – and that they learn and grow in ways that lead to productive and respectful relationships throughout their entire lives.

**8. Do you think St. Paul's did what it could to protect its students?**

Let's be clear, we do not ever condone sexual assault or any conduct that is at odds with our code of conduct, morals and values. We have the fullest commitment to doing everything possible to ensure the safety of our students and the school community. That was true prior to this incident, and remains true today.

**9. What are you doing as a school to educate students and the School community about issues such as sexuality, unacceptable behavior, etc.? What's in place to safeguard St. Paul's from this ever happening again?**

St. Paul's continuously examines how to improve the educational experience for our students – their safety and health has always been at the center of our mission as a school. We regularly communicate with and educate our students about proper and safe behavior and such sensitive issues as sexuality. We are also committed to providing resources and support to them.

As a school community, we are most concerned with providing a safe and healthy environment for our students. We have policies in place to ensure that they are safe, secure and treated equitably. We do our utmost to enforce these policies, and to guide our students concerning challenging topics like sexuality, intimacy and personal responsibility. We will continue to engage our students in thoughtful dialogue and educational sessions to address challenging and personal topics as we strive for continuous improvement.

**10. Do the allegations that surfaced accurately represent St. Paul's?**

School culture must not be equated with the behavior of one, or even several, individuals within the community. The allegations about St. Paul's and our culture were not – and are not – emblematic of our School or our values, our rules, or our student body, alumni, faculty, and staff. Those claims just simply aren't true.

## **St. Paul's School to Host Symposium**

4/14/2016

"Empathy, Intimacy, and Technology in a Boarding School Environment"

June 15-17, 2016

CONCORD, N.H. – With recent research indicating that 92 percent of teens go online daily, and 24 percent are online "almost constantly,"<sup>[1]</sup> it is now indisputable that technology and the lives of adolescents are intertwined. Navigating this new terrain, particularly among boarding school students who live away from home, is a challenge for school educators and administrators.

This spring, St. Paul's School will convene pre-eminent American scholars and independent school leaders in Concord, N.H., for a three-day symposium titled "Empathy, Intimacy, and Technology in a Boarding School Environment" to explore the intersection of technological, emotional, psychological, and spiritual development in adolescent children.

"We are pleased to bring together these experts and administrators to examine how we educate young people within this new paradigm," says St. Paul's School Rector Michael G. Hirschfeld '85. "We plan to approach today's technology conundrum from a variety of perspectives and develop a guide for fellow educators in all school settings so that we can harness the vast potential of today's hi-tech landscape without jeopardizing what makes us fully human. By doing so, we will fulfill our mandate to educate responsible, healthy students and future world citizens. I believe the findings from this inquiry will also benefit parents as they support and teach their children within this dynamic environment."

### **Symposium speakers include:**

danah boyd, a principal researcher at Microsoft Research and an academic scholar whose work examines the intersection between technology and society, and how young people use social media as part of their everyday practices. Boyd is the author of *It's Complicated: The Social Lives of Networked Teens* (Penguin, 2014). Her current focus is on the social and cultural dimensions of the "big data" phenomenon and its relationship with privacy, and the civil rights implications of data analytics.

Donna Freitas, a professor and scholar who lectures at universities across the United States on her work about college students. Over the years, she has written for national newspapers including The Wall Street Journal, The New York Times, The Boston Globe, and The Washington Post. She is the author of *Sex and the Soul: Juggling Sexuality, Spirituality, Romance, and Religion on America's College Campuses* (Oxford, 2008), based on her national study about how sex and faith coincide (and collide) on campus. Her most recent study centers around how social media is affecting the ways young adults construct identity and navigate relationships, and is the subject of her forthcoming book, *The Happiness Effect* (Oxford, Sept. 2016). Freitas is currently a non-resident research associate at the Center for the Study of Religion and Society at the University of Notre Dame.

Shamus Khan, author of *Privilege: The Making of an Adolescent Elite at St. Paul's School* (Princeton, 2011), and associate professor of sociology at Columbia University. Khan writes about cultural sociology and stratification, with a strong focus on elites. Khan also writes in the areas of gender theory, deliberative politics, and research methodology. He recently served as an opinion columnist for Time Magazine and continues to write about sociology in the popular press.

Catherine Steiner-Adair, a clinical psychologist, school consultant, speaker, and author of the award-winning *The Big Disconnect: Protecting Childhood and Family Relationships in the Digital Age* (Harper Collins, 2013). Dr. Steiner-Adair speaks and consults on a wide range of topics, including social and emotional literacy, nourishing healthy relationships in the digital age, and developing a thoughtful approach to technology in school and life. She is a research associate in the Department of Psychiatry at Harvard Medical School and an associate psychologist at McLean Hospital in Belmont, Mass.

Sherry Turkle has spent the last 30 years researching the psychology of people's relationships with technology, from the early days of personal computers to our current world of robotics, artificial intelligence, social networking, and mobile connectivity. She is the Abby Rockefeller Mauzé Professor of the Social Studies of Science and Technology at MIT, as well as the founder and current director of the MIT Initiative on Technology and Self. Her best-selling book, *Reclaiming Conversation: The Power of Talk in the Digital Age* (Penguin, 2015), focuses on the importance of conversation in digital cultures.



The cost of attendance and meals is \$250 per person. The program includes expert panel presentations and discussions, plenary, and working sessions. Additional information about the speakers, program agenda, registration details, area lodging, is available on the School's [symposium website](#).

6/1/2016

Concerning Lawsuit

Statement from St. Paul's School: "We believe this lawsuit is without merit, and we plan to vigorously defend ourselves. We categorically reject any allegations that St. Paul's School has an unhealthy culture. The safety of our students has been and will continue to be the highest priority for our School."

## **St. Paul's School Symposium**

6/20/2016

More Than 140 Educators from Across the Country Convene for Symposium on Empathy, Intimacy, and Technology at St. Paul's School

CONCORD, N.H. – More than 140 school administrators and educators from across the United States convened at St. Paul's School to discuss the impact of technology on the emotional health and development of youth during a three-day symposium titled, "Empathy, Intimacy, and Technology in a Boarding School Environment," June 15-17.

Participants came from 50 different schools across the academic spectrum, including public, independent, boarding, and single-sex secondary and middle schools, as well as higher education, to form recommendations on best practices to foster healthy interpersonal relationships among students, as well as adults, within school communities, and create ways to decipher the real-time and digital identities of youth.

The symposium opened with presentations by leading experts in the fields of youth, technology, and their intersection: **Sherry Turkle**, the founder and current director of the MIT Initiative on Technology and Self; **danah boyd**, principal researcher at Microsoft Research and an academic scholar with a focus on relationship of technology and society; **Donna Freitas**, non-resident research associate at the Center for the Study of Religion and Society at the University of Notre Dame; and **Catherine Steiner-Adair**, a research associate in the Department of Psychiatry at Harvard Medical School and an associate psychologist at McLean Hospital in Belmont, Mass. Columbia University sociologist and St. Paul's School alumnus **Shamus Khan** moderated the panel.

Symposium attendees spent the subsequent two days in working groups discussing the issues in-depth in areas such as academic curriculum, counseling and student support,

inclusivity and identity, policy and procedure, prevention and intervention, school-parent relationships and collaboration, and school culture.

St. Paul's School has received a grant from The Edward E. Ford Foundation to underwrite the publication of the findings, and the final product will be available for peer institutions. Go to [www.sps.edu/symposium](http://www.sps.edu/symposium) for more.

##

### **Speaker Bios**

danah boyd is a principal researcher at Microsoft Research and an academic scholar whose work examines the intersection between technology and society, and how young people use social media as part of their everyday practices. Boyd is the author of *It's Complicated: The Social Lives of Networked Teens* (Penguin, 2014). Her current focus is on the social and cultural dimensions of the "big data" phenomenon and its relationship with privacy and the civil rights implications of data analytics.

Donna Freitas is a professor and scholar who lectures at universities across the United States on her work about college students. Over the years, she has written for national newspapers including *The Wall Street Journal*, *The New York Times*, *The Boston Globe*, and *The Washington Post*. She is the author of *Sex and the Soul: Juggling Sexuality, Spirituality, Romance, and Religion on America's College Campuses* (Oxford, 2008), based on her national study about how sex and faith coincide (and collide) on campus. Her most recent study centers around how social media is affecting the ways young adults construct identity and navigate relationships, and is the subject of her forthcoming book, *The Happiness Effect* (Oxford, Sept. 2016). Freitas is currently a non-resident research associate at the Center for the Study of Religion and Society at the University of Notre Dame.

Shamus Khan is the author of *Privilege: The Making of an Adolescent Elite at St. Paul's School* (Princeton, 2011), and associate professor of sociology at Columbia University. Khan writes about cultural sociology and stratification, with a strong focus on elites. Khan also writes in the areas of gender theory, deliberative politics, and research methodology. He recently served as an opinion columnist for *Time Magazine* and continues to write about sociology in the popular press.

Catherine Steiner-Adair is a clinical psychologist, school consultant, speaker, and author of the award-winning *The Big Disconnect: Protecting Childhood and Family Relationships in the Digital Age* (Harper Collins, 2013). Dr. Steiner-Adair speaks and consults on a wide range of topics, including social and emotional literacy, nourishing healthy relationships in the digital age, and developing a thoughtful approach to technology in school and life. She is a research associate in the Department of Psychiatry at Harvard Medical School and an associate psychologist at McLean Hospital in Belmont, Mass.

Sherry Turkle has spent the last 30 years researching the psychology of people's relationships with technology, from the early days of personal computers to our current world of robotics, artificial intelligence, social networking, and mobile connectivity. She is the Abby Rockefeller Mauzé Professor of the Social Studies of Science and Technology at MIT, as well as the founder and current director of the MIT Initiative on Technology and Self. Her best-selling book, *Reclaiming Conversation: The Power of Talk in the Digital Age* (Penguin, 2015), focuses on the importance of conversation in digital